

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DANIEL GRAND,)	CASE NO.: 1:22-CV-01594
)	
Plaintiff,)	JUDGE: BRIDGET MEEHAN BRENNAN
vs.)	
)	<u>MOTION FOR ENLARGEMENT OF</u>
CITY OF UNIVERSITY HEIGHTS,)	<u>TIME WITHIN WHICH TO MOVE OR</u>
OHIO, et al.,)	<u>PLEAD TO COMPLAINT</u>
)	
Defendants)	

Now come Defendants City of University Heights and Michael Dylan Brennan, by and through counsel, and hereby move this Honorable Court pursuant to Fed.R.Civ.P. 6(b) for an enlargement of time of twenty-one (21) days from November 8, 2022 within which to move, plead, or otherwise respond to Plaintiff's Complaint. The Complaint makes wide-ranging and detailed allegations of fact that require a detailed review with numerous witnesses, which has been precluded by trial obligations of the undersigned. Defendants have previously been granted no enlargements of time for a total of – 0 – days and, by way of the attached affidavit, certifies that this motion is not interposed for purposes of harassment or delay.

In view of the foregoing, Defendants City of University Heights and Michael Dylan Brennan, respectfully requests that this Honorable Court grant them an extension of time of twenty-one (21) days through and including November 29, 2022 within which to move or plead to Plaintiff's Complaint.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/James A. Climer

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Counsel for Defendants City of University Heights
and Michael Dylan Brennan

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2022, a copy of the foregoing Motion for Enlargement of Time Within Which to Move or Plead to Complaint was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/James A. Climer

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